

MICHELE BECKWITH
Acting United States Attorney
AUDREY HEMESATH
MATTHEW THUESEN
SAM STEFANKI
Assistant United States Attorneys
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHAHRIAR "SEAN" LOLOEE,
KARLA MONTOYA,
MIRWAIS SHAMS, and
AHMAD "SHAH" SHAMS,

Defendants.

CASE NO. 2:23-CR-00320-KJM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

STIPULATION

1. By previous order, this matter was set for status on May 27, 2025. Mins., ECF No. 148. Also by previous order, time under the Speedy Trial Act was excluded through May 13, 2025. Order, ECF No. 144.

2. By this stipulation, the parties now request that the Court enter an order excluding time under the Speedy Trial Act between May 13, 2025, and May 27, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The discovery in this case consists of at least ten terabytes of data that was previously produced to defense counsel on multiple hard drives. The discovery in this case also includes dozens of boxes of physical employment records, which must be reviewed in person.

1 All of this discovery has been either produced directly to defense counsel and/or made available
2 for inspection and copying. To date, defense counsel has reviewed hundreds of thousands of
3 pages of discovery and continues to do so.

4 b) Between May 13 and May 27, counsel for all defendants will continue reviewing
5 produced discovery, conducting investigation and research relevant to the charges facing their
6 clients, and otherwise preparing for trial. Counsel for all defendants anticipate informing the
7 Court of an updated estimate for when this process will be complete at the upcoming status
8 conference.

9 c) Counsel for the defendants believe that failure to grant the above-requested
10 exclusion would deny them reasonable time necessary for effective preparation, taking into
11 account the exercise of due diligence.

12 d) The government does not object to the requested exclusion of time.

13 e) Based on the above-stated findings, the ends of justice served by excluding time
14 as requested outweigh the interest of the public and the defendants in a trial within the original
15 date prescribed by the Speedy Trial Act.

16 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
17 et seq., within which trial must commence, the time period of May 13, 2025, to May 27, 2025,
18 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
19 because it results from an exclusion granted by the Court at the defendants' request on the basis
20 of the Court's finding that the ends of justice served by taking such action outweigh the best
21 interest of the public and the defendants in a speedy trial.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 8, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ SAM STEFANKI
AUDREY HEMESATH
MATTHEW THUESEN
SAM STEFANKI
Assistant United States Attorneys

Dated: May 8, 2025

/s/ SHERRY D.H. HAUS
SHERRY D.H. HAUS
Counsel for Defendant SHAHRIAR LOLOEE

Dated: May 8, 2025

/s/ KEVIN JAMES ROONEY
KEVIN JAMES ROONEY
Counsel for Defendant SHAHRIAR LOLOEE

Dated: May 8, 2025

/s/ THOMAS A. JOHNSON
THOMAS A. JOHNSON
Counsel for Defendant SHAHRIAR LOLOEE

Dated: May 8, 2025

/s/ WILLIAM J. PORTANOVA
WILLIAM J. PORTANOVA
Counsel for Defendant KARLA MONTOYA

Dated: May 8, 2025

/s/ MICHAEL D. LONG
MICHAEL D. LONG
Counsel for Defendant MIRWAIS SHAMS

Dated: May 8, 2025

/s/ TIMOTHY E. WARRINER
TIMOTHY E. WARRINER
Counsel for Defendant AHMAD SHAMS

ORDER

IT IS SO FOUND AND ORDERED this 29th day of May, 2025 (nunc pro tunc to May 8, 2025).


SENIOR UNITED STATES DISTRICT JUDGE